

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 1:17-cr-104
Plaintiff,	)	
	)	
vs.	)	<b>DEFENDANT’S SENTENCING</b>
	)	<b>MEMORANDUM</b>
RAYAN BROOKE WOLF,	)	
	)	
Defendant.	)	

Rayan Wolf asks this Court for a sentence of time served and one year of supervision to follow. She has minimal criminal history, a college degree, employment with the Three Bears Casino, is fighting to regain her sobriety (she struggled with addiction to prescription pills), and has a very promising future. Ms. Wolf pled guilty to misdemeanor theft within Indian country. She used a credit card from the Tex Fox Justice Center to purchase gasoline after the Justice Center terminated her employment. Dismissed conduct included writing fraudulent checks from the Tex Fox Justice Center employee fund and buying groceries at Jason Super’s Foods using the Tex Fox Justice Center’s ongoing account there (she was not authorized to do so).

Her United States Sentencing Guideline range for all of her conduct is 0-6 months. Presentence Investigation Report, ¶ 62. Ms. Wolf expects the government will join her in recommending time served. She will also pay the \$25 special assessment fee. Finally, she has to pay restitution for this crime. Unlike most other theft crimes, Ms. Wolf actually started paying back restitution before the federal government charged her. The parties tentatively agreed that the restitution total remaining to be paid is \$6,736.12. However, Ms. Wolf made two separate payments to the Tribe that have not yet been accounted for. The parties are trying to get the

precise total and expect that the restitution total will be less than \$6,736.12 come sentencing. The parties will present the total and final restitution request then.

Dated this 5th day of April, 2018.

Respectfully submitted,

NEIL FULTON  
Federal Public Defender  
By:

/s/ Ryan M. Costello  
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